

Main (212) 451-2900
Fax (212) 451-2999
iclarke-fisher@rc.com
Direct (212) 451-2974

Also admitted in Connecticut
and Massachusetts

May 25, 2021

Via ECF

Hon. Analisa Torres
United States District Judge
United States District Court, Southern District of New York
500 Pearl Street
New York, NY 10007

Re: ***Lawrence Young v. Hardware and Tools Corp.***
Case No. 1:21-cv-02869-AT
Joint Letter Motion to Adjourn Initial Status Conference and Pleading Deadline

Dear Judge Torres:

This Firm was just retained by Defendant Hardware and Tools Corp. (“Defendant”) in the above-referenced action.

As an initial matter, we write to respectfully request additional time to respond to the Complaint, from May 14, 2021 to and including June 25, 2021. Due to our recent retention, we will need this additional time to review and investigate Plaintiff’s allegations.

In addition, we write on behalf of all Parties to respectfully request that the Initial Pretrial Conference (“Conference”) currently scheduled for June 2, 2021 (Doc. No. 7) be adjourned to some date at the Court’s convenience after July 5, 2021. Good cause exists for the requested adjournment as Defendant is in the process of investigating the Plaintiff’s claims, at which point the Parties will need to meet and confer pursuant to the Court’s rules in advance of the Conference.

This is the Parties first request for an adjournment of the Conference and extension of the pleading deadline.

Hon. Analisa Torres
May 25, 2021
Page 2

We thank the Court for its consideration in this matter.

Respectfully submitted,

/s/ Ian T. Clarke-Fisher

Ian T. Clarke-Fisher
ICF/bf

cc: Michael A. LaBollita, Esq. (Via ECF)
Jeffrey M. Gottlieb, Esq. (Via ECF)
Dona L. Gottlieb, Esq. (Via ECF)

GRANTED. The initial pretrial conference scheduled for June 2, 2021, is ADJOURNED to **July 8, 2021**, at **10:20 a.m.** By **July 1, 2021**, the parties shall file their joint letter and proposed case management plan.

By **June 25, 2021**, Defendant shall answer or otherwise respond to the complaint.

SO ORDERED.

Dated: June 1, 2021
New York, New York



ANALISA TORRES
United States District Judge